

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION  
OF THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX  
REFUND SCHEME LITIGATION

MASTER DOCKET

18-md-2865 (LAK)

This document relates to: 18-cv-05053,  
18-cv-09797, 18-cv-09836, 18-cv-09837,  
18-cv-09838, 18-cv-09839, 18-cv-09840,  
18-cv-09841, 18-cv-10100

**DECLARATION OF JOHN C. BLESSINGTON**

I, JOHN C. BLESSINGTON, declare as follows:

1. I am a partner with the firm K&L Gates LLP and am counsel for Defendants Acer Investment Group, LLC, DW Construction, Inc. Retirement Plan, Kamco Investments, Inc. Pension Plan, Kamco LP Profit Sharing Pension Plan, Linden Associates Defined Benefit Plan, Moira Associates 401(K) LLC Plan, Riverside Associates Defined Benefit Plan, American Investment Group of New York, L.P. Pension Plan, Newsong Fellowship Church 401(k) Plan, Stacey Kaminer, David Schulman, Joan Schulman, Alexander Jamie Mitchell III, Louise Kaminer, Darren Wittwer, and Robert Crema in the above-captioned action (18-md-2865) and the related civil actions (18-cv-05053, 18-cv-09797, 18-cv-09836, 18-cv-09837, 18-cv-09838, 18-cv-09839, 18-cv-09840, 18-cv-09841, 18-cv-10100).

2. I have personal knowledge of the matters stated herein.

3. Attached hereto as Exhibit 1 is an index of the Amended Complaints filed by Plaintiff Skatteforvaltningen ("SKAT") in the related actions.

4. Attached hereto as Exhibit 2 are true and correct copies of the Amended Complaints filed in the related actions and referenced in Exhibit 1.

5. Attached hereto as Exhibit 3 is a true and correct copy of *Allen v. Stewart Title Guar. Co.*, No. 06-cv-2426, 2007 WL 916859 (E.D. Pa. March 20, 2007).

6. Attached hereto as Exhibit 4 is a true and correct copy of *In re Adelpia Commc'ns Corp. Secs. & Derivative Litig.*, No. 3-mdl-1529, 2013 WL 6838899 (S.D.N.Y. Dec. 27, 2013).

7. Attached hereto as Exhibit 5 is a true and correct copy of *In re Ford Fusion & C-Max Fuel Econ. Litig.*, No. 13-MD-2450, 2015 WL 7018369 (S.D.N.Y. Nov. 12, 2015).

I, JOHN C. BLESSINGTON, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: July 2, 2020

/s/ John C. Blessington

John C. Blessington